## ORDNANCE PRODUCTS, INC. ENFORCEMENT REMOVAL ADMINISTRATIVE RECORD FILE \* \*\* \*\* INDEX OF DOCUMENTS

## I. ENFORCEMENT DOCUMENTS

- Letter to Mr. Michael C. Powell, Assistant Attorney General of Maryland, from Mr. Charles R. Taylor, Jr., Gordon, Feinblatt, Rothman, Hoffberger & Hollander, re: Representative of Mechanics Valley Trade Center, Inc., 10/22/87. P. 100001-100002.
- 2. Letter to Mr. Christopher R. Schraff, Porter, Wright, Morris & Arthur, Mr. Charles R. Taylor, Gordon, Feinblatt, Rothman, Hoffberger & Hollander, and Mr. Andrew and Mrs. Patricia Hodorowicz, from Ms. Norma Jean Kraus Belt and Mr. Neil S. Freidman, Office of the Attorney General of Maryland, re: Completion of a consent order, 12/1/87. P. 100003-100026. An Administrative Order by Consent is attached.
- 3. Letter to Mr. Peter Wood, Mechanics Valley Trade Center, Inc., from Mr. Charles E. Smyser, Cecil County Health Department, re: Discharge of potentially hazardous material, 12/22/87. P. 100027-100027.
- 4. Letter to Mr. Christopher R. Schraff, Porter, Wright, Morris & Arthur, from Ms. Norma Jean Kraus Belt, Office of the Attorney General of Maryland, re: Changes to the Consent Order, 1/13/88. P. 100028-100050. The Administrative Order by Consent is attached.
- 5. Letter to Mr. Kevan K. Langer [sic], KDI Corporation, from Mr. Peter Wood, Mechanics Valley Trading Center, Inc., re: Modification to the Consent Orders on water treatment and site contamination, 3/7/88. P. 100051-100097. Two Administrative Orders by Consent are attached.
- Administrative Record File available 12/15/88, updated 2/27/91, 9/27/91, and 9/11/94.
- These photographs can be found in the site file located at the EPA Region III Office in Philadelphia, Pennsylvania.
- \*\*\* These documents are considered confidential.

- 6. Letter to Ms. Norma Jean Kraus Belt, Office of the Attorney General of Maryland, from Mr. Christopher R. Schraff, Porter, Wright, Morris & Arthur, re: Execution of the administrative order relating to the water treatment systems, 3/15/88. P. 100098-100099.
- 7. U.S. EPA Pollution Report #1, Mechanics Valley Ordnance Site, 3/28/88. P. 100100-100102. A "Materials Presently Known On-Site Mechanics Valley/OPI Site" page is attached.
- 8. Draft Scope of Work, Mechanics Valley Ordnance Site, 3/28/88. P. 100103-100213. The following are attached:
  - a) site location maps;
  - b) site sketches;
  - c) site physical inventory;
  - d) ground and surface water sampling results.
- 9. Letter to Mr. Richard Dowsey, U.S. EPA, from Mr. Peter Wood, Mechanics Valley Trade Center, Inc., re: Transmittal of an inspection report, 4/28/88.
  P. 100214-100255. A report on an environmental survey of acreage is attached.
- 10. Letter to Mr. Richard J. Dulcey, U.S. EPA, from Mr. Charles R. Taylor, Jr., Gordon, Feinblatt, Rothman, Hoffberger & Hollander, re: Mechanics Valley non-willingness to enter into Consent Order, 5/17/88. P. 100256-100257.
- 11. Letter to Mr. Christopher R. Schraff, Porter, Wright, Morris & Arthur, from Ms. Norma Jean Kraus Belt, Office of the Attorney General of Maryland, re: Withdrawal of the Administrative Consent Order, 5/24/88. P. 100258-100259.
- 12. Letter to Ms. Norma Jean Kraus Belt, Office of the Attorney General of Maryland, from Mr. Christopher R. Schraff, Porter, Wright, Morris & Arthur, re: Response to comments on the Consent Order, 6/7/88. P. 100260-100261.
- 13. Letter to Mr. Kevin Langer, KDI Corporation, from Mr. Stephen R. Wassersug, U.S. EPA, re: Transmittal of the Unilateral Order, 6/27/88. P. 100262-100293. An

Administrative Order, Docket No. III-88-34-DC, In the Matter of: Ordnance Products, is attached.

- 14. Letter to Mr. Stephen R. Wassersug, U.S. EPA, from Mr. Christopher R. Schraff, Porter, Wright, Morris & Arthur, re: Comments to the Unilateral Order, 6/29/88. P. 100294-100296.
- 15. Letter to Mr. Christopher P. Thomas, U.S. EPA, from Mr. Christopher R. Schraff, Porter, Wright, Morris & Arthur, re: Additional comments on the Unilateral Order prior to implementation, 7/6/88. P. 100297-100299.
- 16. Letter to Ms. Norma Jean Kraus Belt, Office of the Attorney General of Maryland, from Mr. Christopher R. Schraff, Porter, Wright, Morris & Arthur, re: Site inspection notification, 7/7/88. P. 100300-100300.
- 17. Letter to Ms. Norma Jean Kraus Belt, Office of the Attorney General of Maryland, from Mr. Christopher R. Schraff, Porter, Wright, Morris & Arthur, re: Confirmation of site inspection, 7/11/88. P. 100301-100302.
- 18. Letter to Mr. Christopher P. Thomas, U.S. EPA, from Mr. Christopher R. Schraff, Porter, Wright, Morris & Arthur, re: Proposed Work Plan submittal date, 7/19/88. P. 100303-100303.
- 19. Letter to Ms. Mary Letzkus, U.S. EPA, from Mr. James T. Mickam, O'Brien & Gere, re: Transmittal of the proposed Site Assessment and Work Plan, 7/20/88. P. 100304-100309. The Site Assessment Work Plan is attached.
- 20. Letter to Mr. Christopher P. Thomas, U.S. EPA, from Mr. James T. Mickam, O'Brien & Gere, re: Transmittal of the proposed Off-Site Residential Well Inventory and Sampling Plan, 7/21/88. P. 100310-100323. The Work Plan for Mechanics Valley Trade Center is attached.
- 21. Report: <u>Drum and Material Removal Program, Mechanics</u>
  <u>Valley Trade Center</u>, prepared by O'Brien & Gere, 7/88.
  P. 100324-100371.
- 22. Report: Site Assessment Work Plan, Mechanics Valley

- Trade Center, prepared by O'Brien & Gere, 8/88. P. 100372-100534.
- 23. Report: Off-Site Residential Well Inventory and Sampling Program, Mechanics Valley Trade Center, prepared by O'Brien & Gere, 10/88. P. 100535-100590.
- 24. Letter to Mr. Christopher P. Thomas, U.S. EPA, from Mr. Charles R. Taylor, Gordon, Feinblatt, Rothman, Hoffberger & Hollander, re: Willingness to erect fencing, 12/7/88. P. 100591-100593.
- 25. Letter to Mr. Chris Thomas, U.S. EPA, from Mr. Peter J. Wood, Mechanics Valley Trade Center, Inc., re: A proposal for fence installation, 12/19/88. P. 100594-100596.
- 26. Letter to Ms. Norma Jean Kraus Belt, Office of the Attorney General of Maryland, from Ms. Mary M. Letzkus, U.S. EPA, re: Transmittal of the CERCLA Unilateral Order, 1/3/89. P. 100597-100621. The Administrative Order, Docket No. III-88-41-DC, In the Matter of: Ordnance Products, Inc., and two certified mail receipts are attached.
- 27. Letter to Mr. Peter Wood, Mechanics Valley Trade Center, Inc., from Mr. Stephen R. Wassersug, U.S. EPA, re: Transmittal of the Unilateral Order, 1/3/89. P. 100622-100647. The Administrative Order, Docket No. III-88-41-DC, In the Matter of: Ordnance Products, Inc., two certified mail receipts, and a letter regarding the CERCLA Unilateral Order for the Site are attached.
- 28. Letter to Mr. Christopher Thomas, U.S. EPA, from Mr. Peter Wood, Mechanics Valley Trade Center, Inc., re: Confirmation of telephone conversation, 1/9/89. P. 100648-100649. An envelope is attached.
- 29. Letter to Mr. Christopher P. Thomas, U.S. EPA, from Mr. Charles R. Taylor, Gordon, Feinblatt, Rothman, Hoffberger & Hollander, re: Request for information, 1/10/89. P. 100650-100652. An envelope is attached.
- 30. Phone Conversation Record between Mr. C. Thomas, U.S. EPA and Mr. Bob Schock, EPC Labs, re: Air Stripper Maintenance Plan, 1/23/89. P. 100653-100653.

- 31. Phone Conversation Record between Mr. C. Thomas, U.S. EPA and Mr. Fred Barker, O.H. Materials, re: Work Plan performance, 1/25/89. P. 100654-100654.
- 32. Letter to Mr. Christopher P. Thomas, U.S. EPA, from Mr. Fred Parker, O.H. Materials, re: Description of sampling maintenance, 1/27/89. P. 100655-100656. An envelope is attached.
- 33. Letter to Mr. Fred Parker, O.H. Materials, from Mr. Christopher Thomas, U.S. EPA, re: Request for a Quality Assurance Project Plan, 2/9/89. P. 100657-100658.
- 34. Phone Conversation Record between Mr. C. Thomas, U.S. EPA, and Mr. Fred Barker, O.H. Materials, re: Air stripper requirements, 3/2/89. P. 100659-100659.
- 35. Letter to Mr. Christopher P. Thomas, U.S. EPA, from Mr. Fred Parker, O.H. Materials, re: Transmittal of laboratory analysis, 3/6/89. P. 100660-100666. An analysis report for halogenated volatile organics, a chain of custody record, and an envelope are attached.
- 36. Letter to Mr. Christopher P. Thomas, U.S. EPA, from Mr. Fred Parker, O.H. Materials, re: Transmittal of the QA/QC sampling techniques, 3/6/89. P. 100667-100672. A report on sampling procedures and an envelope are attached.
- 37. Letter to Mr. Christopher P. Thomas, U.S. EPA, from Mr. Fred Parker, O.H. Materials, re: Transmittal of laboratory analysis for May 3, 1989, 6/19/89. P. 100673-100677. An analysis report for halogenated volatile organics and a chain of custody record are attached.
- 38. Letter to Mr. Peter J. Wood, Mechanics Valley Trade Center, from Mr. Christopher P. Thomas, Mechanics Valley Trade Center, re: Request for a new report on sampling and maintenance of the air stripper, 12/4/89. P. 100678-100679. A certified mail receipt is attached.
- 39. Letter to Mr. William Freedrick [sic], Key Properties, from Mr. Christopher P. Thomas, U.S. EPA, re:
  Problems with the site for prospective leasers,

- 12/10/89. P. 100680-100680.
- 40. Letter to Mr. Bill Frederick, Mechanics Valley Trade Center, Inc., from Mr. Fred Parker, O.H. Materials, re: Summary of duties to be performed, 3/22/90. P. 100681-100688. A proposal of duties and responsibilities between OHM and the U.S. EPA is attached.
- 41. Letter to Mr. Bill Frederick, Mechanics Valley Trade Center, Inc., from Mr. Christopher P. Thomas, U.S. EPA, re: Additional request for stock transaction information, 4/23/90. P. 100689-100689.
- 42. Letter to Mr. Peter Wood from Mr. Christopher P. Thomas, U.S. EPA, re: Sale of Ordnance Products Site, 4/24/90. P. 100690-100691.
- 43. Letter to Mr. Christopher P. Thomas, U.S. EPA, from Mr. Bill Frederick, Mechanics Valley Trade Center, Inc., re: Transmittal of transaction documents, 4/30/90. P. 100692-100718. The following are attached:
  - a) a stock certificate;
  - b) a waiver of notice;
  - c) minutes of the April 28, 1988 shareholders meeting;
  - d) a payment schedule;
  - e) two resignation letters;
  - f) a stock purchase agreement.
- 44. Letter to Mr. Christopher P. Thomas, U.S. EPA, from Mr. Charles R. Taylor, Gordon, Feinblatt, Rothman, Hoffberger & Hollander, re: Change of Ordnance Products Site ownership, 5/1/90. P. 100719-100720.
- 45. Letter to Mr. Chris Thomas, U.S. EPA, from Ms. Nancy Richards, O.H. Materials, re: Transmittal of analytical results from April 23, 1990, 5/15/90. P. 100721-100729. An analysis for halogenated volatiles and a chain of custody record are attached.
- 46. Letter to Mr. Robert Foresti, O'Brien & Gere Engineers, Inc., from Mr. Orest Hrycky, OBG Technical Services,

- re: Home water treatment for local resident, 5/23/90. P. 100730-100730.
- 47. Letter to Mr. Chris Thomas, U.S. EPA, from Mr. Bill Frederick, Mechanic's Valley Trade Center, Inc., re: Transmittal of an OHM's analytical report, 5/30/90. P. 100731-100739. An analytical report for halogenated volatiles is attached.
- 48. Letter to Mr. Chris Thomas, U.S. EPA, from Ms. Nancy Richards, O.H. Materials, re: Transmittal of analytical results from May 22, 1990, 6/11/90.
  P. 100740-100749. An analytical report for halogenated volatiles is attached.
- 49. Letter to Mr. Chris Thomas, U.S. EPA, from Ms. Nancy Richards, O.H. Materials, re: Analytical results for Mechanics Valley Trade Center, Inc., 7/2/90. P. 100750-100750.
- 50. Memorandum to Ms. Lordes Rodriguez, U.S. EPA, from Ms. Heather Gray Torres, U.S. EPA, re: New case assignment, 7/5/90. P. 100751-100751.
- 51. Letter to Mr. Chris Thomas, U.S. EPA, from Mr. Richard K. Haestier, Key Properties, Inc., re: Transmittal of sampling analyses from April 24, 1990 and June 12, 1990, 7/9/90. P. 100752-100780. Analytical reports for halogenated volatile organics are attached.
- 52. Letter to Mr. Chris Thomas, U.S. EPA, from Ms. Nancy Richards, O.H. Materials, re: Transmittal of sampling data from July 27, 1990, 8/24/90. P. 100781-100788. An analytical report for halogenated volatile organics is attached.
- 53. Administrative Order, In the Matter Of: Ordnance Products, Inc. Site, Mechanics Valley Trade Center, Inc., Respondent, Docket No. III-88-41-DC, 12/31/88. P. 100789-100811.
- \*\* 54. Photographs, Ordnance Products, Inc., Site, (undated).

## Update Information

\*\*\* 55. Deed of Trust between Mechanics Valley Trade Center,

- Incorporated, Grantor; S. Dell Foxx and/or E. Pershing Volkart, Trustee; and County Banking and Trust Company, Beneficiary, 7/16/86. An Adjustable Rate Loan Rider is attached.
- 56. Report: A Preliminary Assessment of Ordnance Products, Inc., North East, Maryland, Final Report, prepared by Maryland Hazardous & Solid Waste Management Administration, 8/88. P. 100812-100817.
- \*\*\* 57. Mortgage between Mechanics Valley Trade Center, Inc., and Jupiter Square S.C. Associates, Lender, 12/14/89.
- \*\*\* 58. Settlement Statement between Marine Tech, Inc., Borrower, Mechanics Valley Trade Center, Seller, and Jupiter Square S.C. Associates, Lender, 12/14/89.
  - 59. Report: Screening Site Inspection of the Ordnance
    Products, Inc. Site, Cecil County, Maryland, prepared
    by Maryland Department of the Environment, 8/90.
    P. 100818-101002. A letter dated February 11, 1991
    regarding the addenda to the Screening Site Inspection
    Report is attached.
- \*\*\* 60. Confessed Judgement Promissory Note, 2/27/92. An Assignment of Rents is attached.
  - 61. Letter to Mr. Christopher Thomas, U.S. EPA, from Mr. Guy A. Swenson, O'Brien & Gere, re: Summary and evaluation of soil remediation values and proposed soil remediation values, 9/4/92. P. 101003-101008.
  - 62. Letter to Mr. Guy Swenson, O'Brien & Gere Engineers, Inc., from Mr. Christopher P. Thomas, U.S. EPA, re: EPA's comments on the proposed clean-up levels for contaminants at the site, 5/3/93. P. 101009-101010.
  - 63. Memorandum to file from Mr. Joe Arena, U.S. EPA, re: Summary of a walk-through inspection of the site, 3/30/94. P. 101011-101012.
  - 64. Letter to Mr. William Frederick, Mechanics Valley Trade Center, from Mr. Dennis P. Carney, U.S. EPA, re: Request for information relating to Mechanics Valley Trade Center's ability to pay for or perform a clean-up at the site, 3/30/94. P. 101013-101037. A financial

Statement of Corporate, a second letter dated March 30, 1994 addressed to Mr. William Frederick at a different address regarding a request for information, and an envelope indicating not forwarded and returned to EPA, are attached.

- 65. Letter to Mr. William Frederick, Mechanics Valley Trade Center, from Mr. Abraham Ferdas, U.S. EPA, re: Notice of potential liability, 3/31/94. P. 101048-101053. An envelope indicating not forwarded and returned to EPA is attached.
- \*\*\* 66. Receipt for Property, Ordnance Products, Inc., 5/18/94. Five rent checks from T&T Auto Exchange are attached.
- \*\*\* 67. Interview of Mr. Dale Tennant, Mechanics Valley Trading Center, by Mr. Larry Richardson, U.S. EPA, conducted on 5/18/94.
- \*\*\* 68. Interview of Mr. Rahn Krylow, Mechanics Valley Trading Center, by Mr. Larry Richardson, U.S. EPA, conducted on 5/18/94.
  - 69. Report: Summary Investigation Report, Ordnance
    Products, Inc., Mechanics Valley Trade Center, North
    East, Maryland, prepared by O'Brien & Gere Engineers,
    Inc., 6/94. P. 101054-101154. A transmittal
    memorandum is attached.
- \*\*\* 70. Facsimile letter to Mr. Joe Arena, U.S. EPA, from Mr. Al Moyer, Archibald Mining & Minerals, Inc., re: Proposed site locations for 5-MW's and a letter of permission to be on the property, 6/28/94. The proposed site locations for 5-MW's and a partial letter regarding permission to be on the property are attached.
  - 71. Administrative Order For Removal Response Action, In The Matter Of: Ordnance Products Site, Mechanics Valley Trade Center, Inc., a Corporation, and William Frederick, an Individual, Respondents, Docket No. III-94-28-DC, 8/11/94. P. 101155-101179.